

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

INFORMATION

The United States Attorney charges:

Introduction

At all times material to this Information:

1. Hobby Lobby Stores, Inc. (“Hobby Lobby”) was a retailer of arts, crafts, and other goods headquartered in Oklahoma City, Oklahoma.

2. **JAMIE VINCE ENGLISH (“ENGLISH”)** was employed as a Network Engineer at Hobby Lobby from November 28, 2016, until on or about December 2, 2019.

As a Network Engineer, **ENGLISH** had access to electronic hardware equipment such as small form-factor pluggable transceiver modules (“SFPs”), network switches, and wireless access points (“APs”) (collectively referred to as “electronic hardware equipment”) owned by Hobby Lobby.

3. eBay, Inc. (“eBay”) was an online auction house and marketplace that facilitated the sale of goods between third-party buyers and sellers. eBay was headquartered in San Jose, California. Its servers were located outside of Oklahoma.

4. As part of the eBay registration process, eBay required all users to agree to comply with eBay's User Agreement. In the User Agreement, eBay specified various "restricted activities" from which all users agreed to refrain, including selling stolen items. Any eBay user that did not represent that he or she would abide by these restrictions was not permitted to use eBay's services. Additionally, eBay advised all of its users in a separate policy statement that the sale of stolen property was "strictly prohibited."

5. PayPal Holdings, Inc. ("PayPal") was an online payment platform headquartered in San Jose, California that facilitated payments between individuals and businesses. Its servers were located outside of Oklahoma.

6. At all times relevant to the Information, **ENGLISH** maintained a PayPal account (ending in *5888) (**ENGLISH's** PayPal Account).

COUNT 1
(WIRE FRAUD)

7. The United States Attorney incorporates paragraphs 1–6 by reference.

The Scheme to Defraud

8. Beginning on or about November 28, 2017, and continuing through at least November 19, 2019, **ENGLISH** knowingly devised, intended to devise, and executed a scheme and artifice to defraud Hobby Lobby in a material manner and to obtain its electronic hardware equipment by means of materially false and fraudulent pretenses, representations and promises.

9. It was part of the scheme and artifice that **ENGLISH** removed electronic hardware equipment from Hobby Lobby's corporate offices located at 7707 Southwest 44th Street, Oklahoma City, Oklahoma.

10. It was part of the scheme and artifice that beginning on or about November 28, 2017, and continuing through at least November 19, 2019, **ENGLISH** sold the electronic hardware equipment on eBay under the username "Formulatkm" for his own personal benefit.

11. It was further part of the scheme and artifice to defraud that once **ENGLISH** sold embezzled electronic hardware equipment online, funds were transferred to **ENGLISH's** PayPal account for his own personal benefit. The value of the missing equipment embezzled and sold totaled \$130,088.96.

Purpose of the Scheme to Defraud

12. It was the purpose of the scheme for **ENGLISH** to unlawfully enrich himself by embezzling and selling the equipment for his own personal benefit.

Wiring in Furtherance of the Scheme

13. On or about November 16, 2018, in the Western District of Oklahoma,

----- **JAMIE VINCE ENGLISH**, ----- for the purposes of executing the above-described scheme to defraud in a material manner and to embezzle software equipment by means of materially false and fraudulent pretenses, representations and promises and with the intent to defraud, knowingly caused signals to

be transmitted by means of wire communications in interstate commerce. In particular, **ENGLISH** embezzled a Cisco WS-C2960X-48LPS-L 48 port ethernet switch from Hobby Lobby and sold the switch on eBay, which caused PayPal in California to use interstate wire communications to transfer approximately \$799.31 to **ENGLISH's** PayPal account.

All in violation of Title 18, United States Code, Section 1343.

ROBERT J. TROESTER
United States Attorney

s/ Matt Dillon

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